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12 Attorneys for Defendants

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION
17

18 JAY KATZ, Individually and on Behalf of All
19 Others Similarly Situated,

20 Plaintiff,

21 v.

22 SONY COMPUTER ENTERTAINMENT
AMERICA LLC and SONY NETWORK
23 ENTERTAINMENT INTERNATIONAL LLC,

24 Defendants.
25

Case No. 3:11-cv-02229-EDL

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: Magistrate Judge Elizabeth D.
Laporte

26 WHEREAS, defendants Sony Computer Entertainment America LLC ("SCEA") and
27 Sony Network Entertainment International LLC ("SNEI"), as well as certain related entities
28

1 (collectively, the “Sony Defendants”), have been named as defendants in at least twenty-one (21)
2 putative class action lawsuits within this District, to date;

3 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
4 least eighteen (18) putative class action lawsuits pending outside this District, to date;

5 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
6 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed
7 to date, and as to which other responses, including Sony Defendants’ response, are due by June 2,
8 2011.

9 WHEREAS, the current deadlines for SCEA and SNEI to respond to the Complaint are
10 May 31, 2011 and June 1, 2011, respectively;

11 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
12 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
13 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
14 JPML;

15 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
16 by and through their respective counsel, hereby stipulate as follows:

17 The deadline for the defendants to respond to the Complaint in the above-captioned action
18 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
19 litigation centralizing the above-captioned action with other matters, or if centralization is denied
20 by the JPML, then 30 days from the date of such order denying centralization.

1 Dated: May 16, 2011

MICHELE M. DESOER
MARC A. WITES
WITES & KAPETAN, P.A.

4 By: /s/ Michele M. Desoer /s/ [as authorized]
Michele M. Desoer

6 Attorneys for Plaintiff
JAY KATZ

7 Dated: May 16, 2011

HARVEY WOLKOFF
THAD A. DAVIS
ROCKY C. TSAI
ROPES & GRAY LLP

11 By: /s/ Rocky C. Tsai /s/
Rocky C. Tsai

13 Attorneys for Defendants
SONY COMPUTER
ENTERTAINMENT AMERICA LLC;
SONY NETWORK ENTERTAINMENT
INTERNATIONAL LLC

16 ~~PROPOSED~~ ORDER

17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

18 Dated: May 18, 2011

19 By: U.S.D. Judge

